



TETRA TECH
COFFEY

Modern Slavery Statement

29 June 2021

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ABOUT THIS STATEMENT

The Modern Slavery Act 2018 (Cth) (the Act) requires entities with an annual consolidated revenue of over a \$100 million that are either classed as an Australian entity or a foreign entity carrying out business in Australia during the reporting period, to prepare and publish an annual Modern Slavery Statement (Statement).

This Statement has been prepared pursuant to Section 14 of the Act, by Tetra Tech Coffey Holding (Tetra Tech Coffey, we, us) on behalf of the reporting the following reporting entities:

- ▶ Tetra Tech Coffey Holding Pty Limited.
- ▶ Coffey International Pty Limited.
- ▶ Tetra Tech International Development Pty Ltd.
- ▶ Coffey Australia Holdings Pty Ltd.
- ▶ Coffey Services Australia Pty Ltd.

This Statement covers the financial year ending September 2020 and sets out the process taken by Tetra Tech Coffey to identify, assess and address the risks of modern slavery in our operations and supply chains.

STATEMENT APPROVAL

This Statement for financial year 2020 is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) and constitutes Tetra Tech Coffey Holdings' Modern Slavery Statement.

The Statement was approved by the board of Tetra Tech Coffey Holding Pty Ltd, on behalf of the listed reporting entities on 16 June 2021. This statement be reviewed and updated it as necessary, annually.

Brigid Moriarty
President – Tetra Tech Coffey

INTRODUCTION

Tetra Tech Coffey Holding Pty Limited (Tetra Tech Coffey Holding) is a wholly owned subsidiary of Tetra Tech, Inc., a NASDAQ-listed company with a global workforce of 20,000 staff working across 120 countries.

Tetra Tech Coffey Holding provides consulting services in the areas of geotechnics, environment, engineering, project management, and international development.

Tetra Tech Coffey Holding's international development business (Tetra Tech International Development Pty Ltd (Tetra Tech International Development)) provides substantially different services to the rest of the businesses of Tetra Tech Coffey Holding and it has a separate management team and structure which reports directly to Tetra Tech, Inc.

Accordingly, Tetra Tech International Development Pty Ltd is submitting its own Modern Slavery Statement. This Modern Slavery Statement does not address Tetra Tech International Development's business unless expressly stated.

The statement has been provided on behalf of Tetra Tech Coffey Holding Pty Limited. Where reference is made to Tetra Tech Coffey Holding, this reference includes all of the listed Tetra Tech entities including Tetra Tech International Development. Where reference is made to Tetra Tech Coffey, this reference excludes Tetra Tech International Development.

It is the policy of Tetra Tech Coffey to proactively identify and manage the environmental, social and economic impacts within our supply chain, and as identified by our key stakeholders and our business.

Tetra Tech Coffey is committed to:

- ▶ Setting objectives and action plans in support of this statement and pursuing improvement of our practices.
- ▶ Prioritising business with suppliers who have embedded sustainable and ethical practices within their organisation and who drive such practices within their own supply chain.
- ▶ Complying with applicable legislation.

This statement will be circulated throughout Tetra Tech Coffey and is available for public review. It will be reviewed on a regular basis to evaluate relevance, monitor compliance and drive improvement.

OUR ORGANISATION

TETRA TECH COFFEY HOLDING

Established in Australia in 1959, Tetra Tech Coffey Holding is a trusted expert in the provision of geotechnical, environmental, engineering, project management, and international development services.

The core areas of expertise for Tetra Tech Coffey Holding include:

- ▶ **Infrastructure:** We support the development of modern and efficient infrastructure across Australia and New Zealand. Our teams of geotechnical, environmental, civil, structural and project management professionals work with clients across all stages of their project life cycle.
- ▶ **Mining:** We provide a wide range of technical services to clients in the mining industry.
- ▶ **Defence:** We deliver specialist consulting services to the Australian Defence Force. Our expert teams of environmental scientists, engineers, project managers and planners have worked in this space for more than 30 years.
- ▶ **Geotechnical:** We provide ground engineering services including site investigation, geotechnical interpretation, analysis and design, and construction advice for a range of projects, clients and environments.
- ▶ **Project Management:** We provide project management services across every phase of a project's lifecycle.
- ▶ **Environments:** We provide specialist environmental, social and safety performance solutions. Our services include feasibility studies, approval management and stakeholder engagement through to environmental management, occupational health and safety, and waste management. We specialise in contaminated site assessment and remediation.

- ▶ **Renewable Energy and Climate Change:** We provide consulting and advisory services to companies, institutions, and governments with expertise across geothermal, hydropower, solar, and wind projects.
- ▶ **Eco Logical Australia:** Eco Logical Australia provides multi-disciplinary environmental consultancy services across a range of specialist areas, including, ecology, restoration ecology, aquatic ecology, archaeology and heritage, GIS, bushfire, natural resource management, and ecology.
- ▶ **International Development:** We support clients across several development markets, providing practical and sustainable services, focused on empowering local communities and leveraging private investment to create a safer, more prosperous world.

As stated previously, this statement has been provided on behalf of Tetra Tech Coffey Holding Pty Limited for the following reporting entities:

- ▶ Tetra Tech Coffey Holding Pty Limited.
- ▶ Coffey International Pty Limited.
- ▶ Tetra Tech International Development Pty Ltd.
- ▶ Coffey Australia Holdings Pty Ltd.
- ▶ Coffey Services Australia Pty Ltd.

Tetra Tech International Development has prepared its own Modern Slavery Act Statement.

Where reference is made to Tetra Tech Coffey Holding, this reference includes all of the listed Tetra Tech entities including Tetra Tech International Development. Where reference is made to Tetra Tech Coffey, this reference excludes Tetra Tech International Development.

OUR STRUCTURE

Tetra Tech Coffey Holding, headquartered in Australia, has management control over the following legal entities:

- ▶ Coffey International Pty Limited.
- ▶ Tetra Tech International Development Pty Ltd.
- ▶ Coffey Australia Holdings Pty Ltd.
- ▶ Coffey Services Australia Pty Ltd.
- ▶ Coffey Services (NZ) Limited.
- ▶ Eco Logical (Australia) Pty Ltd.

As stated, Tetra Tech International Development conducts substantially different business to the rest of Tetra Tech Coffey Holding and is, accordingly, submitting its own Modern Slavery Statement. This Modern Slavery Statement does not address Tetra Tech International Development's business unless expressly stated.

Any reference to the Coffey Group or Tetra Tech Coffey does not include Tetra Tech International Development except where expressly stated.

OUR OPERATIONS

Tetra Tech Coffey has offices in the following locations:

- ▶ Australia:
 - Adelaide, SA
 - Armidale, NSW
 - Austinmer, NSW
 - Brisbane, QLD
 - Canberra, ACT
 - Chatswood (Head office), NSW
 - Coffs Harbour, NSW
 - Darwin, NT
 - Geelong, VIC
 - Huskisson and Narooma, NSW
 - Ingleburn, NSW
 - Melbourne, VIC
 - Mudgee, NSW
 - Newcastle, NSW
 - Perth, WA
 - Sutherland, NSW
 - Sydney, NSW

- ▶ New Zealand:
 - Auckland
 - Christchurch
 - Tauranga
 - Wellington
- ▶ Papua New Guinea

Tetra Tech Coffey has over 750 staff based across the abovementioned office locations.

OUR WORKFORCE

Tetra Tech Coffey's workforce comprises the following breakdown:

- ▶ Casual: 115
- ▶ Part time: 100
- ▶ Permanent: 550

Most of our workers are qualified and/or experienced professionals in the fields in which we offer services. Our workforce also includes administrative and support staff who assist in the operation of our business.

OUR SUPPLIERS

Tetra Tech Coffey's owned or controlled entities have common suppliers.

Tetra Tech Coffey's top ten supplier categories account for over 90% of our spend for the reporting period.

Our top ten supplier types are represented in Figure 2 and include real estate, Tetra Tech sister companies, consulting services, field testing and laboratory services, drilling, analytical laboratory services, recruitment, finance services including tax and auditing and telecommunications.

The majority of our supply chain is also located within Australia and New Zealand with relatively few suppliers located in other countries. The locations of our supply chain are also shown graphically in Figure 1.

OUR SUPPLY CHAIN

A description of the Tetra Tech Coffey supply chain is provided below.

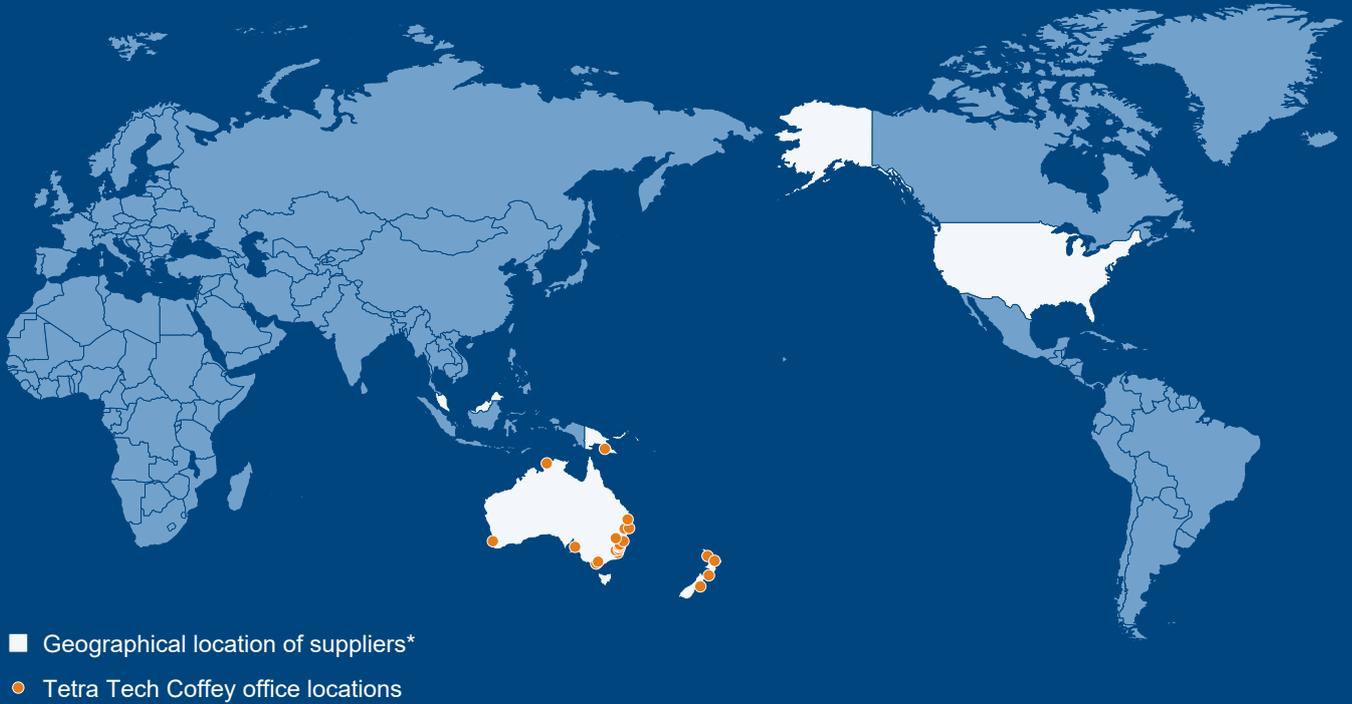


Figure 1: Tetra Tech Coffey supply chain map by region, based on 2020 financial year spend.
 *Single suppliers based in India (BIM and CAD services) and The Netherlands (Subscription) have been excluded from this graphic.

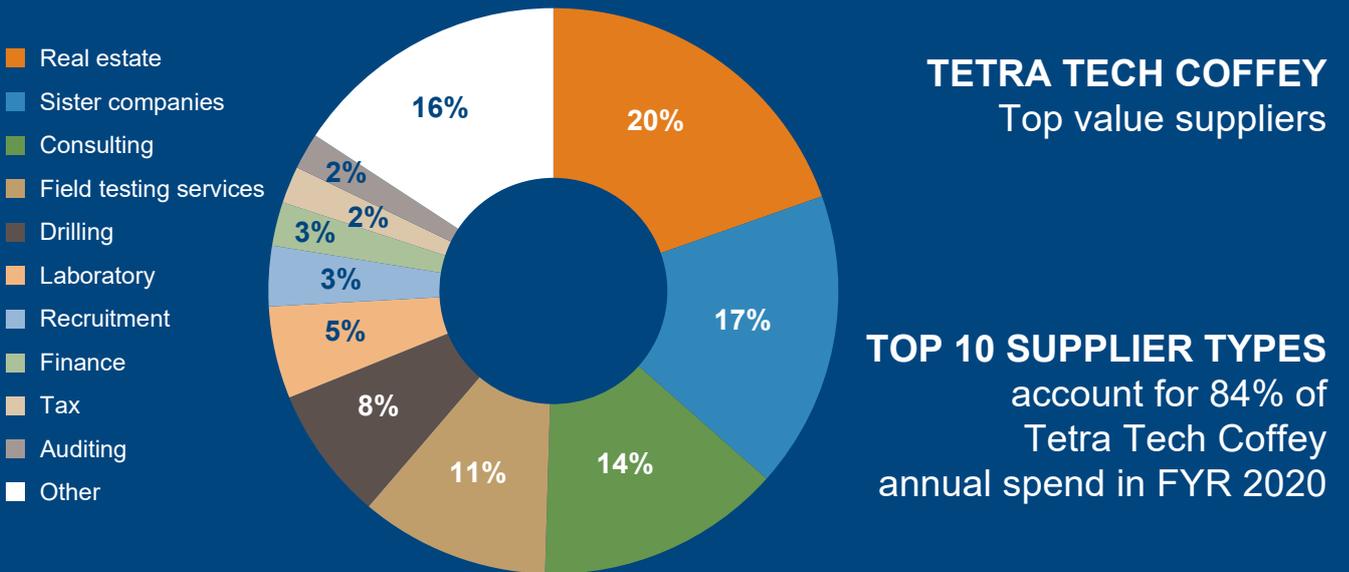


Figure 2: Top ten supplier types for Tetra Tech Coffey 2020 financial year spend.

RISK ASSESSMENT

OPERATIONS

Tetra Tech Coffey employs over 750 staff across Australia, New Zealand and Papua New Guinea (PNG). Most of our employees are employed on a full-time basis, with proportionally fewer part time and casual employees.

Most of our staff are professionals with university qualifications and/or industry experience. We also employ administrative staff to support our operations.

Most of our employees are employed in Australia or New Zealand with a small team in PNG. Work completed outside Australia, New Zealand or PNG is undertaken by our employees who are mobilised to those sites.

Staff are screened prior to employment for their right to work and age to ensure their suitability for employment.

Staff remuneration is based on industry standards and acquired benchmarking data for similar industry groups.

For these reasons, we consider that the combined operational modern slavery risk for the Tetra Tech Coffey Holding companies is low.

SUPPLY CHAIN

Our suppliers have supply chains that may have risks of modern slavery over which we have limited visibility. Our screening of our supply chain has identified that the highest potential for exposure to modern slavery exists in:

- ▶ The manufacture and supply of uniforms and personal protective equipment.
- ▶ Cleaning services.
- ▶ IT – supply of hardware or software supply and support services.
- ▶ Traffic management.
- ▶ Labour hire providers, particularly in high risk jurisdictions;
- ▶ Hotels, restaurants and leisure.
- ▶ Road and rail transportation.

- ▶ Security.

Most of our suppliers are based in Australia and New Zealand, which are low risk jurisdictions for modern slavery. Where we conduct work outside those countries we use the same controls for supplier prequalification.

We understand that our suppliers located in Australia and New Zealand may be supplying goods or services that originate from higher risk jurisdictions. To assist us to understand this, and other, less visible modern slavery risk factors in our supply chain, we issued modern slavery questionnaires (MSQ) via an on-line hosted survey platform. The survey was issued to our more significant suppliers that provided goods and/or services to us during the 2020 reporting year. This assisted us to understand the potential risk of modern slavery in our supply chain and we intend to use the information to initiate discussions with higher risk suppliers.

MSQs were issued on behalf of all of the Tetra Tech Coffey entities to suppliers that represent approximately 58% of our supply chain by value of service during the 2019/20 financial year. This supplier list was selected with reference to:

- ▶ Major suppliers by total spend.
- ▶ Suppliers we interacted with on repeated occasions (frequently used suppliers) but where the total spend was relatively low.
- ▶ Suppliers who conduct activities that are considered to represent a higher risk for potential exposure to modern slavery.

In undertaking the MSQ process, we adopted a pragmatic risk-based approach in line with the United Nations Guiding Principles on Business and Human Rights.

SUMMARY OF SUPPLY CHAIN SCREENING RESULTS

Based on the information gathered during the MSQ process, the geographic footprint of the suppliers assessed is shown below.



The top five countries where our suppliers have business operations are:

- ▶ Australia.
- ▶ New Zealand.
- ▶ China.
- ▶ The United States of America.
- ▶ Canada.

One supplier specified that they had operations in India. China and India were the two high risk countries identified during the MSQ process. Italy and Ireland were the two moderate risk countries identified during the MSQ process.

Tetra Tech Coffey suppliers were sent the MSQ and requested to complete the questionnaire within a two week period. Upon conclusion of the two week period, 105 of our suppliers submitted their responses. The average modern slavery risk rating based on the responses was 4 out of 10 (refer Figure 3), resulting in an overall low risk average.

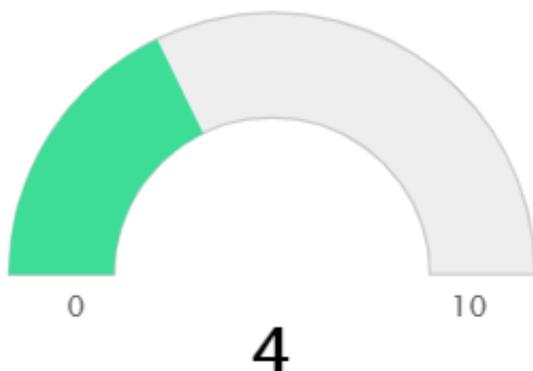


Figure 3: Average supplier risk score

Most of the suppliers who responded had not undertaken a human rights impact assessment as shown in Figure 4. This is as expected given this was the first reporting year for the Australian Modern Slavery Act.

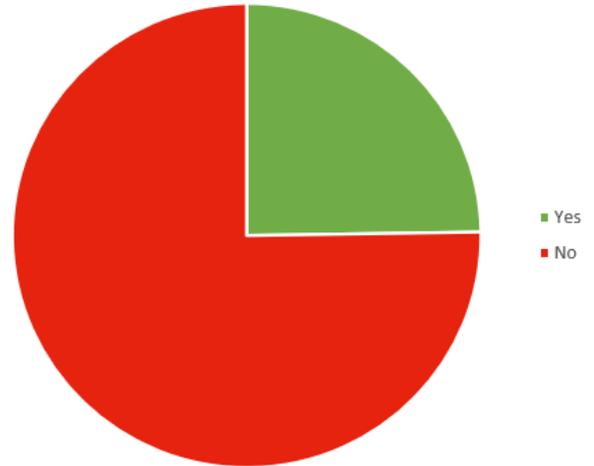


Figure 4: Supplier human rights impact assessment completion

Most of the suppliers who responded also confirmed that they have in place, and agree to maintain at all times, adequate policies, controls, procedures and training designed to: prevent, detect, assess, manage and remedy modern slavery in their operations and supply chains.

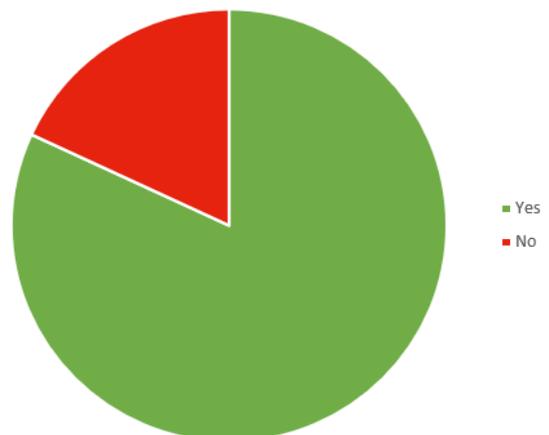


Figure 5: Supplier policy, control and procedure implementation

A breakdown of the risk ratings of those who completed the MSQ presented in Figure 6.

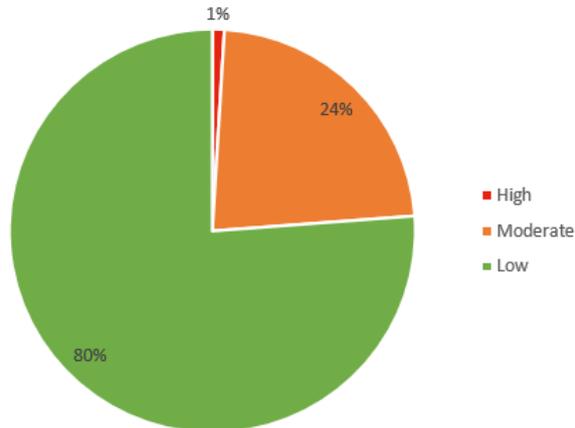


Figure 6: Supplier risk rating summary

One supplier operating in the construction sector received a high risk rating due to the following high risk areas shown in red below. The orange risk denotes a moderate risk profile:

- Jurisdiction**
- Activity**
- Workforce**
- Policies And Systems**
- Human Rights**

20 suppliers received a moderate risk rating largely due to their industry risk profile for sectors such as construction, mining, transport and warehousing, manufacturing and agriculture. However, their high sector risk was mitigated by having controls, codes and policies in place.

The MSQ process has brought to our attention the suppliers with whom we need to engage for further due diligence in our second reporting period.

SUPPLIER ENGAGEMENT

We understand that each of our suppliers also have their own supply chains, which may expose us to modern slavery risk. Beyond the information collected as part of the MSQ, we currently have limited visibility of this risk. Over the coming year, we will work with our suppliers to better understand the risk within their supply chain and their management controls.

Tetra Tech Coffey has commenced engaging directly with our suppliers to validate our supply chain screening process, refine our understanding of social risk and develop actions to tackle risk in both their and our supply chains.

We have utilised a proprietary on-line hosted MSQ survey platform and its outputs to underpin a structured approach to supplier engagement.

TETRA TECH INTERNATIONAL DEVELOPMENT OPERATIONS

Tetra Tech International Development has operations in countries that are considered to have a higher inherent risk of modern slavery, such as Fiji, Indonesia, PNG, Tonga, Cambodia, and the Philippines.

Tetra Tech International Development's exposure to modern slavery risk is largely indirect and predominantly associated with the level of expenditure into reported high-risk industries rather than evidenced on their direct interaction with modern slavery practices.

Further details regarding the risks in the operations of Tetra Tech International Development can be found in their modern slavery statement.

OUR PLANNED ACTIONS

Tetra Tech Coffey has used the results of its supply chain screening activities, in conjunction with supplier survey feedback received to date, to set out tangible actions for assessing, managing and reducing modern slavery risks in our supply chain.

Our planned actions, which include internal and external initiatives, are described in this section and will be progressed over the next 12 months, unless stipulated otherwise.

OUR OPERATIONS

The risk of modern slavery within our workforce is considered low due to the candidate review methodologies we adopt, the employee contracts we execute and the remuneration processes and reviews we apply, being based on benchmarked data from similar service industries.

We have developed a modern slavery policy that informs our staff of our expectations in relation to the identification, reporting, management and control of modern slavery risks within our operations.

We have developed a whistle-blower policy and trained our staff in the application of its requirements. This policy was recently updated to state that modern slavery concerns can constitute a protected disclosure under the policy.

As part of the consultation process to develop this statement, we have run training in relation to modern slavery for key executives. We will continue to educate our staff about modern slavery by providing awareness training to all staff and specific procedure-based training for staff who engage with our suppliers. This procedure-based training will educate our staff about how we review our supply chain and suppliers, how we engage with medium and high risk suppliers and how we monitor for compliance with our requirements.

We will monitor the performance of our modern slavery screening processes and develop and implement improvements where warranted. We will continue to collaborate with other Tetra Tech businesses within our region to align our

processes and allow the identification of improvement possibilities across businesses.

OUR SUPPLY CHAIN

As outlined above, our due diligence in preparation of this statement has included issuing questionnaires to a selected subset of our suppliers. Their answers enable us to better understand their approach to the identification and management of modern slavery risks within their operations and supply chain. In future years, suppliers will be screened at regular intervals based on their risk profile.

We have developed a supplier code of conduct and will request that our suppliers acknowledge their acceptance of it and agree to abide by its requirements.

We will re-assess suppliers who pose a high risk or high potential exposure to modern slavery to:

- ▶ Determine if their service is critical to our business and whether an alternate and lower risk supplier may be engaged.
- ▶ Assist them in modifying their exposure and/or control measures to reduce their level of risk.
- ▶ Monitor their performance to ensure risks are appropriately controlled.

For critical suppliers identified as high risk, we will work with those suppliers to understand the origin of the risk of modern slavery in their work and offer support to educate their staff regarding modern slavery risk and to assist in the identification and implementation of suitable controls to reduce the exposure risk.

PROCUREMENT

Our procurement procedures will include the following:

- ▶ Screening of existing suppliers for their compliance with the Act, via the online MSQ survey.
- ▶ Pre-screening of potential new suppliers.
- ▶ Ongoing reassessment of suppliers to monitor for the effectiveness of our system and approach.
- ▶ A requirement for our suppliers to commit to abiding by our supplier code of conduct or have in place a suitable alternate.
- ▶ Offering commercial terms that include specific reference to obligations in respect to the Modern Slavery Act. Where these terms cannot be agreed, as a minimum, the supplier must be screened and commit to our supplier code of conduct.
- ▶ Providing support for critical, high risk suppliers, identified based on results of the supplier screening process to assist in the reduction of modern slavery risks.

ASSESSING EFFECTIVENESS

ONGOING PROCESS OF REVIEW

We will continue to work with and screen our suppliers for modern slavery risks. Our process will include the analysis of the MSQ results year-on-year to identify patterns, emergent risks and priorities for further due diligence.

We will evaluate the MSQ responses for high risk suppliers to determine root causes. Where their involvement on a project is necessary or critical, we will work with them to educate them and their staff about the risk of modern slavery and to help in the identification and implementation of suitable controls to minimise the exposure risk.

We will seek to assess the effectiveness of our actions by tracking:

- ▶ The number and percentage of our staff who have attended the required awareness and procedure based training.
- ▶ The number and percentage of suppliers who have been screened.
- ▶ The number and percentage of suppliers who have accepted our code of conduct or implemented their own similar terms.
- ▶ The outcomes of the screening process and the number and percentage of suppliers determined as being low, medium or high risk.
- ▶ The results of internal audits conducted to check for our own compliance with requirements.
- ▶ The changes in MSQ responses and summary data over time for suppliers or supplier types.
- ▶ Whistle-blower reports/complaints relating to modern slavery risks or potential breaches of our policy of supplier code of conduct.
- ▶ The investigations and outcomes of investigations of potential or reported breaches.

CONSULTATION PROCESS

Tetra Tech Coffey has worked with the Tetra Tech companies in our region to understand and learn from their approach to the identification and management of modern slavery risks and to provide consistency of approach within the companies over which we have control.

We also sought input from Tetra Tech International Development, which is a subsidiary of Tetra Tech Coffey Holding, and has developed its own modern slavery statement.

We consulted with Norman Disney Young, a Tetra Tech Company, that developed its own modern slavery statement.

We consulted with and received input and review from Eco Logical Australia, which is a subsidiary of Tetra Tech Coffey Holding, whose activities are included in this modern slavery statement.

Each of the Tetra Tech Coffey companies fed into and reviewed this modern slavery statement in draft format prior to its approval and submission.

REVISION HISTORY

Revision	Date	Revision
Rev0	31 March 2021	Original submission
Rev1	29 June 2021	Confirmation of board approval